



Water Resources Division
Resource Management Directorate
Nunavut Regional Office
P.O. Box 100
Iqaluit, NU, X0A 0H0

Your file - Votre référence
2BE-HUC1823
Our file - Notre référence
GCDOCS# 116946255

September 11, 2023

Robert Hunter
Licensing Administrator
Nunavut Water Board
P.O. Box 119
Gjoa Haven, NU, X0B 1J0
E-mail: licensing@nwb-oen.ca

**Re: Crown-Indigenous Relations and Northern Affairs Canada's Review of the
Licence Renewal Application for the Huckleberry Exploration Project, Type B
Water Licence No. 2BE-HUC1823**

Dear Robert,

Thank you for the August 21, 2023 invitation to review the referenced licence renewal application, submitted by Agnico Eagle Mines Limited (AEM), for Type B Water Licence No. 2BE-HUC1823.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) examined the application pursuant to its mandated responsibilities under the *Nunavut Waters and Nunavut Surface Rights Tribunal Act* and the *Department of Crown-Indigenous Relations and Northern Affairs Act*. CIRNAC notes that it used the 2018 application to determine its comments and recommendations as the 2023 renewal application was incomplete and the applicant stated that all plans and uses would remain the same. Please find CIRNAC comments and recommendations in the attached Technical Memorandum.

If there are any questions or concerns, please contact me at (867) 975-3877 or Joyce.Demers@rcaanc-cirnac.gc.ca or Andrew Keim at (867) 975-4550 or Andrew.Keim@rcaanc-cirnac.gc.ca.

Sincerely,

Joyce Demers, B.Sc.,
Industrial Coordinator



Technical Review Memorandum

Date: September 11, 2023

To: Robert Hunter – Licensing Administrator, Nunavut Water Board

From: Joyce Demers – Industrial Coordinator, CIRNAC

Subject: **Crown-Indigenous Relations and Northern Affairs Canada’s Review of the Licence Renewal Application for the Huckleberry Exploration Project, Type B Water Licence No. 2BE-HUC1823**

Region: Kitikmeot Kivalliq Qikiqtani

A. BACKGROUND

The Huckleberry mineral exploration property is located in the Kivalliq region of Nunavut approximately 65 km west of Whale Cove, 110 km north of Arviat, and 115 km southwest of Rankin Inlet at the geographical location 62° 7' 12" N 93° 51' 38" W. AEM operates a Type B exploration water license 2BE-HUC1823.

AEM is applying for a 5 year water licence renewal. There are no proposed changes to the water license, with a water withdrawal rate of 299 m³/day, for exploration and camp use. The Huckleberry camp is a 20 person exploration camp located at a previously used exploration camp with an existing air strip. The exploration camp also has a winter access trail which is approximately 313 km long 6 m wide which leads to Meliadine Gold Mine and from Whale Cove area.

Huckleberry camp activities include: staking, prospecting using airborne and ground-based geophysical surveys, exploration, drilling on-land and on-ice drilling with the use of a diamond drill and a rab drill, trenching activities, establishment of exploration camp and associated facilities, the use of two helicopters and a Twin Otter plane to transport material, equipment, and personnel to site, the use of a D6 bulldozer and mini excavator to move the diamond drill during the winter to different drill sites, winter access from the Meliadine Gold Mine and from Whale Cove area for transportation purposes, the use of tracked Challenger tractors, all-terrain vehicles (ATVs) and snowmobiles. Mineral exploration is proposed to take place seasonally, between April and October.

CIRNAC provides the following comments and recommendations pertaining to the application package. A summary of the subjects of recommendations can be found in Table 1. Documents reviewed as part of this submission can be found in Table 2 of Section B. Detailed technical review comments can be found in Section C.



Table 1: Summary of Recommendations

Recommendation Number	Subject
R1	Renewal Application Form Not Filled
R2	Refueling During Drilling
R3	Fuel Management Plan

B. DOCUMENTS REVIEWED AND REFERENCED

The following table (Table 2) provides a list of the documents reviewed under the submission and reference during the review.

Table 2: Documents Reviewed and Referenced

Document Title	Author, File No., Rev., Date
230821 2BE-HUC1823 2023-07-11-NPC letter re # 149141 WL renewal-ILAE	Nunavut Planning Commission, July 11, 2023
230821 2BE-HUC1823 100401-Application_for_Water_Licence_Renewal-ILAE	David Frenette, August 21, 2023
230821 2BE-HUC1823 180323-17EA068-Screening Decision Report-OT4E (2)-ILAE	Nunavut Impact Review Board, March 23, 2018
230821 2BE-HUC1823 Agnico Eagle - Articles of Amalgamation - January 1 2022-ILAE	Ministry of Government and Consumer Services, January 01, 2022
230821 2BE-HUC1823 Distribution Review NPC NIRB Received-OLAE	Nunavut Water Board, August 21, 2023
230821 2BE-HUC1823 KVL318C01_230717_License_2025-ILAE	Kivalliq Inuit Association, July 17, 2023
230821 2BE-HUC1823 Non-technical summary renewal request-ILAE	AEM, N.D.
230821 2BE-HUC1823 notice-OLAE	Nunavut Water Board, August 21, 2023
180420 2BE-HUC---- Main application document-IMLE	N.A., December 2017
180420 2BE-HUC---- Non-technical Summary English-IMLE	N.A., N.D.
180420 2BE-HUC---- Waste Management Plan HB_FEB2018-IMLE	AEM, February 2018
180420 2BE-HUC---- Water Management Plan HB_April2018-IMLE	AEM, April 2018
180515 2BE-HUC---- Spill Contingency Plan-IMLE	AEM, November 2017
180522 2BE-HUC---- Closure & Reclamation Plan-IMLE	AEM, May 2018
180515 2BE-HUC---- Water Licence Application Revised-IMLE	AEM, May 15, 2018



C. RESULTS OF REVIEW

1. Renewal Application Form Not Filled

Comment:

The applicant did not fill all required fields in the renewal application form. This is a concern as CIRNAC cannot fully complete its obligations without looking into past applications.

Recommendation:

(R-01) CIRNAC recommends that the applicant complete all required documents such as the renewal application form when submitting documents to the Nunavut Water Board.

2. Refueling During Drilling

Comment:

In the Spill Contingency Plan section 2.2 it states that

“Refuelling must not take place below the high water mark of any water body and will be done in such a manner as to prevent any hydrocarbon from entering any water body.”

The concern is that it is unclear if refueling will be done within 31 meters from the normal high water mark of any water body. This is a concern as refueling within 31 meters of the normal high water mark of any water body increases the likelihood of fuel entering water bodies.

Recommendation:

(R-02) CIRNAC recommends that the applicant clarify if refueling will be done within 31 meters of the normal high water mark of any water body.

3. Fuel Management Plan

Comment:

The applicant does not have a fuel management plan. This is a concern as a fuel management plan may have useful information with regards to fuel management in one location.

Recommendation:

(R-03) CIRNAC recommends that the applicant consider creating a fuel management plan.